

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE:)	Case No. 19-24857-CMB
)	
Nakia Henderson)	Chapter 13
Debtor)	
)	Claim. No.: 11
Nakia Henderson)	
Movant)	
)	
v.)	
)	
Deutsche Bank National Trust Co., et al)	
Ronda J. Winnecour, Trustee)	
Respondent(s))	

DECLARATION

I, Albert G. Reese Jr., Esquire, attorney for the above-referenced Debtor, hereby submit this formal written Declaration that the existing Chapter 13 Plan is sufficient to fund the plan with the modified debt for the following reason:

Pursuant to Deutsche Bank National Trust Co., et al's Notice of Mortgage Payment Change dated November 26, 2021, the Debtor's current escrow payment for account number ending in **2591** is **\$81.47**. The new escrow payment is **\$97.76**. The new total mortgage payment is **\$514.18** effective January 1, 2022. The Debtor will make the escrow shortage of **\$16.29** in addition to her regular monthly Chapter 13 Plan payment. Counsel to file an Amended Wage Attachment to incorporate the escrow shortage in Debtor's Chapter 13 Plan.

Dated: November 28, 2021

Respectfully submitted by:
/s/ Nakia Henderson
Nakia Henderson

Dated: November 28, 2021

Respectfully submitted by:
/s/ Albert G. Reese, Jr., Esquire
Albert G. Reese, Jr., Esquire
Attorney for Debtor
PA ID #93813
640 Rodi Road, 2nd Floor, Suite 2
Pittsburgh, PA 15235
(412) 241-1697
(412) 241-1687(fax)
areese8897@aol.com